

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF L.M.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, L.M., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am a 25-year-old non-binary person. This means that I do not identify
5 specifically as male or female. I live on the East Side of King County, Washington, and I work
6 at a disability resource center at a state college. In my free time I crochet, I make art, I write, and
7 I enjoy connecting with my community. I go to a biweekly meet-up group for non-binary and
8 gender non-conforming people and a biweekly Dungeons and Dragons game. In addition, I am
9 the older sibling of my transgender brother, F.M.

10 3. I was assigned female at birth. It has been a gradual process for me in figuring
11 out my gender identity. I always experimented with my gender presentation, especially in the
12 clothes I wore. The way I dress has always been important to me. When I was in elementary
13 school, my family lived in Utah and was a part of the Mormon Church. I felt like I needed to fit
14 in, so I presented as hyper-feminine, in dresses and sparkly clothes. I felt uncomfortable
15 presenting myself in this way, but I liked the attention that I received because of it, which made
16 the uncomfortableness worth it for me at the time. Our community had very rigid gender norms
17 and adults would praise me for adhering to them.

18 4. When I was 11, my family moved to Washington state. This was about the time
19 I felt less restricted in my gender expression because there were now less rigid expectations and
20 norms around gender. In middle school, I started dressing in a hyper-masculine way. I cut my
21 hair short, shaved one side of my head, and wore basketball jerseys. I felt uncomfortable and
22 inauthentic presenting this way, too. And, when people started to act confused and look at me
23 strangely because of my appearance, I subconsciously decided to tone it down. Watching my
24 younger brother come out as transgender gave me permission to explore dressing and presenting
25 as neither male nor female.
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1 5. I was a very socially anxious kid. I was very depressed in high school for a
2 number of reasons, but gender dysphoria was one of them. I felt like I didn't know who I was,
3 and I really didn't want to find out. I dissociated from myself. I sort of molded my personality
4 to whoever I was with at the time. It was like I was one person at school and another at home,
5 like I was wearing different masks around everyone. When friends would talk about their
6 experiences of womanhood and what it means to be female in the United States, I would nod
7 along, but I couldn't relate to their experiences. It was like I was an outsider looking in at them,
8 and at myself. At the time I thought it was just because everyone has different experiences, and
9 I wouldn't even let myself consider that maybe it was because I am not a woman.

10 6. When you dissociate from yourself, it's pretty much impossible to really connect
11 with other people. You can't show them who you really are, so they don't get to know you and
12 they can't get really close to you. But in my senior year of high school, I became very close with
13 a non-binary friend, and it was the first time in a long time that I felt a genuine connection with
14 someone. They were the first person in a long time that I felt like myself when I was around
15 them.

16 7. The only gender affirming care I received as a kid was birth control to stop my
17 periods when I was 13.

18 8. After I left high school, I started to feel more comfortable with myself. In college,
19 I finally had the freedom to really explore who I was. I cut my hair again, kept it short, and
20 started playing with my presentation more again. I feel like I have always known I was non-
21 binary, but until about 5 years ago I didn't have the words to describe it.

22 9. My brother, F.M., had a much harder time. F.M. was assigned female at birth, but
23 always identified as male. As soon as F.M. could talk, he was adamant that he was a boy. I
24 remember him being forced to wear a dress at 4-years-old and he was absolutely miserable the
25 whole time. His dysphoria was so significant that he hated having long hair. He would get so
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1 angry and frustrated when people did not acknowledge he was a boy. He was a very active kid,
2 but when he was upset he would go quiet, like a totally different person.

3 10. F.M. transitioned before first grade. He began wearing clothes he liked, cut his
4 hair, and using he/him pronouns. But even then, he was always hypervigilant in public about
5 whether people could tell he was trans. He was very concerned that people would perceive him
6 in a way he didn't want. F.M. was able to start puberty blockers, which gave him time to consider
7 his options and really decide what was best for him.

8 11. This case is important to me not just for myself, but for my brother. I watched
9 him being hypervigilant, always wondering whether people would find out his gender identity.
10 I watched him be forcibly outed in Middle School, and I watched how upset he was before he
11 transitioned as a child. I honestly do not think my brother would be here today if he could not
12 receive gender affirming care. If he was able to feel it so deeply at four years old, I can't begin
13 to imagine how he, as a middle schooler, would feel.

14 12. If the federal government is able to prohibit minors from receiving lifesaving
15 gender affirming care, it is only a matter of time before the federal government bars gender
16 affirming care for everyone.

17 13. I am choosing to use initials for myself and my brother, and I am unable bring
18 this lawsuit myself, because I am afraid of retaliation from the Federal Government that
19 effectively declared that my gender identity does not exist, and that is implementing policies to
20 harm and discriminate against people who have a gender identity like mine. The Federal
21 Government's anti-trans words and policies normalize and encourage harassment and violence
22 against transgender people, putting me at significant risk of harm if I make myself known. Also,
23 I am just starting my career and do not have the financial resources to bring a lawsuit against the
24 President.

1 I declare under penalty of perjury under the laws of the State of Washington and the
2 United States of America that the foregoing is true and correct.

3 DATED this 5th day of February 2025 at Redmond, Washington.

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5 L.M.

6 Non-Binary Person and Sibling of F.M.
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